

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

THE STATE OF LOUISIANA,
By and through its Attorney General, JEFF
LANDRY,

THE STATE OF MONTANA,
By and through its Attorney General, AUSTIN
KNUDSEN,

THE STATE OF ARIZONA,
By and through its Attorney General, Mark
Brnovich, et al.,

PLAINTIFFS,

v.

XAVIER BECERRA, in his official capacity as
Secretary of Health and Human Services; et al.,

DEFENDANTS.

CIVIL ACTION NO. _____

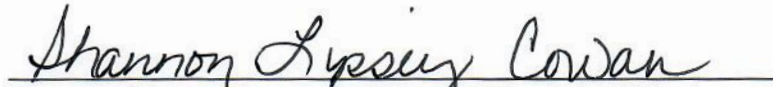
DECLARATION OF SHANNON LIPSEY COWAN

My name is Shannon Lipsey Cowan. I am over the age of 18 and am competent to make this declaration. The facts set forth in this declaration are based on my personal knowledge.

1. I am the owner and Director of Nursing at Woods Haven Nursing Care and Rehabilitation, Inc., d/b/a Woods Haven Senior Citizens Home, located in Pollock, Louisiana. Woods Haven is a skilled nursing facility that employs 56 staff members. I work closely with administration and providers to provide long-term care to our residents. My role as Director of Nursing is a hybrid role, as I also work in the clinical setting providing care to residents as well as an administrative role.
2. Woods Haven provides a number of services and amenities to its residents, including but not limited to skilled nursing services, physical therapy, speech therapy, occupational therapy, social services, daily activities, and hospice care. Our team of professionals works with registered nurses, therapists, dietitians, pharmacists, and other members to coordinate a resident's plan of care. We have a full staff of Registered Nurses, Licensed Practical Nurses, therapists, and Certified Nursing Assistants on duty 24 hours a day.
3. Our nursing facility provides care to both Medicare and Medicaid residents. Because we receive Medicare and Medicaid funding, our nursing facility is subject to the CMS vaccine mandate requiring all healthcare workers to be vaccinated with no option of weekly testing. We are already facing severe labor shortages and struggling to find enough employees to staff the nursing facility appropriately that this mandate causes extreme hardship on our facility.
4. Based on my own personal knowledge, I estimate that approximately 57% of our employees are not vaccinated with the coronavirus vaccine. Of those employees, I estimate most, if not all, to either be unwilling or unable to take the vaccine against coronavirus as mandated by CMS.
5. This new mandate for healthcare workers providing care to Medicare and Medicaid residents will greatly impact our rural nursing facility. If we lose 57% of our workforce, we will be unable to provide safe and efficient care to our residents. As a skilled nursing facility, we have 103 licensed beds, but with close to half of our staff losing their jobs because of this mandate, we will not be able to provide care and services to that many residents in the facility. Because of this large number of staff facing the loss of their jobs, I fear that our rural nursing facility will soon face closing the doors permanently.

I declare under the penalty of perjury that the forgoing is true and correct.

Executed on November 15, 2021.


Shannon Lipsey Cowan, Owner and Director of Nursing
Woods Haven Nursing Care and Rehabilitation, Inc.